



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

May 19, 2003

Ms. Elizabeth Sellers, Manager
Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

Subject: ICDF Waste Acceptance Criteria

Dear Ms. Sellers:

As stated in my letter of October 7, 1999, DEQ concurrence with the Record of Decision for the INEEL CERCLA Disposal Facility (ICDF) was conditional upon my acceptance of the Waste Acceptance Criteria and Operations Plans. This letter is to inform you that DEQ accepts the Waste Acceptance Criteria and Operations Plans for ICDF with one exception, the waste acceptance criterion for I-129.

The high mobility, long-lived nature and risk of I-129, and its presence in the groundwater at INTEC justify caution. My concern with I-129 at the quantities planned for disposal lies with the sensitivity analysis and uncertainties regarding residual sources of I-129 at INTEC. These indicate a potential for unacceptable impacts from I-129 to the Snake River Plain Aquifer over the long term. This finding warrants additional measures for materials containing I-129. DOE can proceed with disposal of other waste while the agencies reach a satisfactory resolution for I-129 contaminated waste.

I would also like assurance from DOE that the ICDF will, at minimum, be operated at the same substantive standards required for commercial facilities over its operational lifetime. Based on our review of the design and operations plans, we are confident that this is currently the case, but DOE must maintain this level of performance.

Lastly, I request that DOE provide DEQ a copy of the database(s) for tracking waste composition, quantities, and disposal locations at least annually.

Please contact me should you have questions concerning this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Stephen Allred", written over a circular stamp.

C. Stephen Allred
Director

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cc: Michael Gearheard, EPA Region 10

Reading/Source File